

**REMARKS**

The Examiner is thanked for the indication that claims 4-6 are allowed.

Claims 1-3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Honda et al. (U.S. Publication No. 2002/0030672) (hereinafter "Honda") in view of Suzuki (U.S. Patent No. 6,476,781) (hereinafter "Suzuki"). Claim 1 has been amended to differently describe embodiments of the disclosure of the instant application. To the extent that these rejections might be deemed to still apply to the claims as newly-amended, they are respectfully traversed for at least the following reasons.

Independent claim 1 of the instant application has been newly-amended to describe an advantageous combination of features of a display device including "a multi-grayscale processing circuit for two-dimensional error diffusion processing or two-dimensional dither processing on the image signal."

Applicants respectfully submit that Honda teaches subfield adjustment on a line-by-line basis. On the other hand, the arrangement described in newly-amended independent claim 1 of the instant application adjusts the subfields on a field-by-field basis. Applicants respectfully submit that the line-by-line adjustment is a one-dimensional adjustment whereas the field-by-field adjustment is a two-dimensional adjustment. Applicants respectfully submit that if Honda is modified with the multi-grayscale processing circuit of Suzuki, that multi-grayscale processing circuit must perform one-dimensional error diffusion processing or one-dimensional dither processing because Honda must deal with one-dimensional subfield adjustment (and in turn one-dimensional brightness adjustment). Applicants respectfully submit that Honda is based on a one-dimensional subfield adjustment principle. On the other hand, Applicants respectfully

submit that the arrangement described in newly-amended independent claim 1 of the instant application must employ a two-dimensional error diffusion processing or two-dimensional dither processing because Applicants' disclosed invention must deal with two-dimensional subfield adjustment. Applicants respectfully submit that the two-dimensional subfield adjustment is not taught, nor even suggested, by Honda. Therefore, Applicants respectfully submit that no matter how Honda might be modified with Suzuki, strictly arguendo, that combination would not arrive at the advantageous combination of features of Applicants' invention, as described in newly-amended independent claim 1 of the instant application.

Accordingly, Applicants respectfully assert that the rejections under 35 U.S.C. § 103(a) should be withdrawn because Honda and Suzuki, whether taken separately or combined, do not teach or suggest each feature of independent claim 1 of the instant application. As pointed out by MPEP § 2143.03, "[a]ll words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)."

Furthermore, Applicants respectfully assert that dependent claims 2-3 are allowable at least because of their dependence from claim 1, and the reasons set forth above. The remaining claims 4-6 have been indicated as allowed by the Examiner.

### **CONCLUSION**

In view of the foregoing amendments and remarks, withdrawal of the rejections and allowance of all pending claims are earnestly solicited. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution. A favorable action is awaited.

**EXCEPT** for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. § 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 50-0573. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,

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